## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: PARAGARD PRODUCTS LIABILITY LITIGATION	: MDL DOCKET NO. 2974
This document relates to:	: 1:20-md-02974-LMM
SOPHIE STRAUSS	:
VS.	Civil Action No.:
	:
TEVA PHARMACEUTICALS USA, INC., ET AL.	: : :
SHORT FORM	M COMPLAINT
Come(s) now the Plaintiff(s) nat	med below, and for her/their Complaint
against the Defendant(s) named below, is	ncorporate(s) the Second Amended Master
Personal Injury Complaint (Doc. No.	79), in MDL No. 2974 by reference.
Plaintiff(s) further plead(s) as follows:	
1. Name of Plaintiff placed with	th Paragard: Sophie Strauss
2. Name of Plaintiff's Spouse	(if a party to the case): N/A

	If case is brought in a representative capacity, Name of Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):  N/A
1	State of Residence of each Plaintiff (including any Plaintiff in a representative capacity) at time of filing of Plaintiff's original complaint:  California
	State of Residence of each Plaintiff at the time of Paragard placement:  California
	State of Residence of each Plaintiff at the time of Paragard removal:  California
	District Court and Division in which personal jurisdiction and venue would be proper:  California Central District Court - Los Angeles, CA
	Defendants. (Check one or more of the following five (5) Defendants against whom Plaintiff's Complaint is made. The following five (5) Defendants are the only defendants against whom a Short Form Complaint may be filed. No other entity may be added as a defendant

in a Short Form Complaint.):

<b>~</b>	A. Teva Pharmaceuticals USA, Inc.
<b>'</b>	B. Teva Women's Health, LLC
<b>'</b>	C. Teva Branded Pharmaceutical Products R&D, Inc.
<b>~</b>	D. The Cooper Companies, Inc.
<b>✓</b>	E. CooperSurgical, Inc.
9.	Basis of Jurisdiction
<b>~</b>	Diversity of Citizenship (28 U.S.C. § 1332(a))
	Other (if Other, identify below):
	Other (if Other, identify below):

Date(s) Plaintiff had Paragard placed (DD/MM/YYYY)	Placing Physician(s) or other Health Care Provider (include City and State)	Date Plaintiff's Paragard was Removed (DD/MM/YYYY)*  *If multiple removal(s) or attempted removal procedures, list date of each separately.	Removal Physician(s) or other Health Care Provider (include City and State)**  **If multiple removal(s) or attempted removal procedures, list information separately.
Unknown at this time.	Unknown at this time.	09/05/2017	Sharon Winer, MD, 9400 Brighton Way, Ste. 206, Beverly Hills, CA 90210
		09/05/2017	William To, MD, 9242 W. Olympic Blvd., Beverly Hills, CA 90212
		09/06/2017	William To, MD, 9242 W. Olympic Blvd., Beverly Hills, CA 90212

illeges bre	akage	e (othe	r tha	n thread	or string br	eakage) o	f hei
upon remo	oval.						
and proximat	e resul	t of using	Para	gard, Plai	ntiff suffered me		
uding but n	ot limit	ed to,pa	in, su	ıffering, a	nd loss of repr	oductive he	alth.
reserves	her	right	to	allege	additional	injuries	and
ions speci	fic to	her.					
dentificati	on:						
	_	ard pla	ced i	n Plaint	iff (if now k	nown):	
ou obtain	n yo	ur Par	agar	d from	anyone o	ther than	the
Care Prov	ider v	who pla	aced	your Pa	ragard:		
S							
the Maste	er Coi	mplain	t bro	ught by	Plaintiff(s):		
Strict Lia	bility	/ Desig	gn D	efect			
- Strict Lia	ability	y / Fail	ure t	o Warn			
– Strict L	iabilit	ty / Ma	nufa	cturing	Defect		
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		Decion	and	M C -	D.C	,	
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	ement of it and proximate uding but no reserves ions special lentification where the Master Care Proves the Master Strict Lia - Strict Lia - Strict Lia - Neglige	ement of injury and proximate resuluding but not limit reserves her ions specific to dentification: amber of Paragawn at this time. Tou obtain you obtain you care Provider with the Master Constrict Liability - Strict Liability - Strict Liability - Negligence	ement of injury(ies) Pland proximate result of using uding but not limited to,pareserves her right ions specific to her.  Identification: Imber of Paragard plant wn at this time.  Tou obtain your Paragard plant who plant the Master Complaint Strict Liability / Designation of Paragard plant who plant the Master Complaint Strict Liability / Fail Tour Strict Liability / Manuel Negligence	ement of injury(ies) Plainting and proximate result of using Parauding but not limited to, pain, sureserves her right to ions specific to her.  Identification: Imber of Paragard placed in which at this time.  You obtain your Paragard Care Provider who placed is the Master Complaint broom Strict Liability / Design Destrict Liability / Failure the Strict Liability / Manufale Negligence	ement of injury(ies) Plaintiff is clared proximate result of using Paragard, Plainuding but not limited to,pain, suffering, a reserves her right to allege ions specific to her.  Identification: Imber of Paragard placed in Plaint wn at this time.  Ou obtain your Paragard from Care Provider who placed your Pass  the Master Complaint brought by Strict Liability / Design Defect  Strict Liability / Failure to Warn  — Strict Liability / Manufacturing in Negligence	ement of injury(ies) Plaintiff is claiming: and proximate result of using Paragard, Plaintiff suffered me uding but not limited to,pain, suffering, and loss of repr reserves her right to allege additional ions specific to her.  dentification: amber of Paragard placed in Plaintiff (if now k wn at this time.  ou obtain your Paragard from anyone o Care Provider who placed your Paragard:  s  the Master Complaint brought by Plaintiff(s): Strict Liability / Design Defect - Strict Liability / Failure to Warn - Strict Liability / Manufacturing Defect - Negligence	ement of injury(ies) Plaintiff is claiming: and proximate result of using Paragard, Plaintiff suffered mental and phy uding but not limited to,pain, suffering, and loss of reproductive he reserves her right to allege additional injuries ions specific to her.  Identification: Imber of Paragard placed in Plaintiff (if now known): wn at this time.  Ou obtain your Paragard from anyone other than Care Provider who placed your Paragard:  Strict Liability / Design Defect - Strict Liability / Failure to Warn  — Strict Liability / Manufacturing Defect

<u> </u>	Count IX – Negligent Misrepresentation
<b>✓</b>	Count X – Breach of Express Warranty
<b>'</b>	Count XI – Breach of Implied Warranty
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Count XII – Violation of Consumer Protection Laws
<b>✓</b>	Count XIII – Gross Negligence
<b>/</b>	Count XIV – Unjust Enrichment
<b>~</b>	Count XV – Punitive Damages
	Count XVI – Loss of Consortium
	Other Count(s) (Please state factual and legal basis for other claims
	2 · · · · · · · · · · · · · · · · · · ·
not i	cluded in the Master Complaint below):
not i	
	cluded in the Master Complaint below):
not i	"Tolling/Fraudulent Concealment" allegations:
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes  No
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes  No
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes  No  b. If Plaintiff is alleging "tolling/fraudulent concealment" beyond
	"Tolling/Fraudulent Concealment" allegations:  a. Is Plaintiff alleging "Tolling/Fraudulent Concealment"?  Yes  No  b. If Plaintiff is alleging "tolling/fraudulent concealment" beyond the facts alleged in the Master Complaint, please state the facts

16.	Cour	nt VII (Fraud & Deceit) and Count VIII (Fraud by Omission)				
	allegations:					
	a.	Is Plaintiff is bringing a claim under Count VII (Fraud &				
		Deceit), Count VIII (Fraud by Omission), and/or any other claim				
		for fraud or misrepresentation?				
	<b>/</b>	Yes				
		No				
	b.	If Yes, the following information must be provided (in				
		accordance with Federal Rule of Civil Procedure 8 and/or 9,				
		and/or with pleading requirements applicable to Plaintiff's state				
		law claims):				
	i.	The alleged statement(s) of material fact that Plaintiff alleges was false: Paragard was a safe, effective and reversible form of birth				
		control and Paragard was safe or safer than other products on the market.				
	ii.	Who allegedly made the statement: Defendants				
	iii.	To whom the statement was allegedly made: Plaintiff and her implanting physician.				
	iv.	The date(s) on which the statement was allegedly made:  Defendants' statements in its label and marketing materials at all relevant times prior to implant.				
17.	If Pla	aintiff is bringing any claim for manufacturing defect and alleging				
	facts	beyond those contained in the Master Complaint, the following				
	infor	rmation must be provided:				
	a.	What does Plaintiff allege is the manufacturing defect in her Paragard? N/A				

18.	Plaintiff's demand for the relief sought if different than what is alleged in the Master Complaint: N/A
19.	Jury Demand:
<b>✓</b>	Jury Trial is demanded as to all counts
	Jury Trial is NOT demanded as to any count
	s/ Robert M. Hammers, Jr.  Attorney(s) for Plaintiff
Address, ph	none number, email address and Bar information:
Atlanta, 0 770-900-	nridge Connector, Suite 975 GA 30342 9000 No. 337211